

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

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CLERK OF COURT

In Re:

Richard M Gast
Claudia E Gast

) Chapter 13
) Debtors.) Bankruptcy No.01-03476B
)

MOTION TO SELL REAL PROPERTY

The Debtors move to be allowed to sell real property upon terms and conditions as set forth below, and in support of said motion allege:

1. The Debtors' Chapter 13 Plan (hereinafter "the Plan") was confirmed by Order of this Court, dated July 6, 2001.

2. Since confirmation of the Plan, the Debtors have made all scheduled payments to the Trustee under the Plan.

3. Debtor, Richard M Gast, unexpectedly inherited approximately 240 acres of rural farmland near Fertile, Minnesota from his mother, (hereinafter referred to as "the Property") which is not subject to any liens.

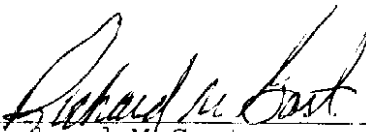
4. The Debtor believes, based upon communication with the attorney's office in Fertile, Minnesota who is handling the administration of his mother's estate, that the property can be sold and used as farmland. The Debtor anticipates these sales would yield approximately \$450.00 per acre. Based upon this, Debtor proposes to sell the land and apply the proceeds therefrom towards fully or partially satisfying their bank obligation.

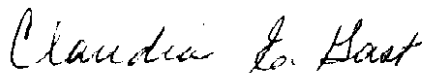
5. Based upon communications with the attorney's office, the Debtor is advised that farmland in this area is often purchased with a down payment and annual payments thereafter.

6. The Debtor proposes that the closing agent submit a separate disbursement directly to the Trustee.

7. Debtors believe that it would be in their best interest and the best interest of creditors for Debtors to be allowed to sell the Property and use the equity toward paying the balance due under the Plan.

WHEREFORE, Debtors pray that they be allowed to sell the Property upon the terms set forth above and apply the proceeds as set forth above, including payment to the Trustee and payment of all future payments required to be made under the Plan; and for such other and further relief as this Court shall deem just and equitable.


Richard M. Gast


Claudia E. Gast

November 15, 2001
Rock Hill, South Carolina